

The Honorable John L. Robart

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

Joseph J. Hesketh III,
*on his behalf and on behalf of other similarly situated
persons*

Plaintiff,

v.

Total Renal Care, Inc, on its own behalf and on
behalf of other similarly situated persons,

Defendants.

Case No: 2:20-cv-01733-JLR

DECLARATION OF CHRISTINA L. HENRY
IN SUPPORT OF OPPOSITION TO
MOTION FOR SUMMARY JUDGMENT

1. I am one of the attorneys of record for the Plaintiff herein. I have personal knowledge of the facts as stated herein and if called upon to testify to the truth thereof, I could and would do so.

2. Attached as Exhibit 1 is a true and correct copy of the transcript of the Deposition of Jeremy Michael Eaves, the corporate representative for DaVita, Inc., taken on May 10, 2021 (“Eaves Deposition”).

3. Attached as Exhibit 2 are true and correct copies of relevant document production from DaVita, Inc. as testified to at the Eaves Deposition at Exhibit 1 at ¶ 29:25 to 30:21.

4. Attached as Exhibit 3 is a true and correct copy of the Errata Sheet to the Eaves Transcript.

5. Attached as Exhibit 4 is a true and correct copy of the Requests for Production with relevant document production from Total Renal Care, Inc.

This Declaration is made under penalty of perjury under the laws of the State of Washington.

/s/ Christina L Henry
Christina L Henry, WSBA# 31273